

# EXHIBIT H

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MINHYE PARK,

Plaintiff,

-against-

DAVID DENNIS KIM, M.D.,

Defendant.  
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Index No.: 1:20-cv-02636

**DEFENDANT'S  
SECOND DEMAND  
FOR PRODUCTION  
OF DOCUMENTS**

**PLEASE TAKE NOTICE** that, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, defendant DAVID DENNIS KIM, M.D. hereby demands that Plaintiff, MINHYE PARK, produce the following within twenty (20) days:

**DEMAND FOR PRODUCTION**

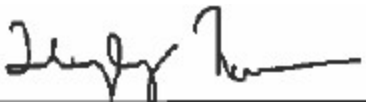
1. Produce copies of MINYE PARK's records from the NATIONAL HEALTH INSURANCE SERVICE (NHIS) of South Korea;
2. Any and all other collateral source records for MINYE PARK's treating providers from 2010 to the present; and
3. All employment records from 2015 through 2018 that Plaintiff intends to rely upon to support claims for lost earnings.

**PLEASE TAKE FURTHER NOTICE**, that all documents are to be produced in English and if the originals exist in Korean, a transcription of those documents along with copies of the original are to be produced.

Dated: New York, New York  
May 24, 2021

Respectfully submitted,

HEIDELL, PITTONI, MURPHY & BACH, LLP

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